



July 6, 2004

Marlene H. Dortch
Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW.
Washington, DC 20554

Subject: Response to Notice of Proposed Rulemaking on Use of N11 Codes and Other Abbreviated Dialing Arrangements - CC Docket No. 92-105; FCC 04-111

Dear Ms. Dortch:

The Northeast Gas Association (NGA)¹ has reviewed the Federal Communications Commission's Notice of Proposed Rulemaking on the use of N11 codes and other abbreviated dialing arrangements. This correspondence represents the comments of the local gas distribution members of NGA regarding this NOPR.

- NGA endorses the use of a national 3-digit dialing code that would be used by the excavating community and the general public to notify owners of underground facilities of their intent to engage in excavation activities. Owners are contacted through their local One Call Center (OCC).
- NGA does not support use of a 10-digit number if a 3-digit number cannot be implemented. This could cause considerable confusion to the excavators as the OCCs already have direct 10-digit numbers.
- NGA does not specifically prefer one 3-digit code over another. We feel that the 3-digit code that has the least technical hurdles to overcome will inflict the fewest problems, and that the most cost effective alternative should be chosen. NGA also does not have a preference to use or not use a leading "*" or "#" symbol; again, the alternative with the fewest challenges and least cost is preferred. The technical experts in this field should make this determination.

¹ NGA is the natural gas association for the local gas distribution companies in New York State, New England, and parts of New Jersey that collectively serve 8.4 million customers. In addition to LDCs, NGA's membership includes transmission companies, liquified natural gas importers, and manufacturers.

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- NGA feels that the various state One Call Centers (OCCs) should not be mandated to release their present OCC numbers in lieu of the 3-digit number; these numbers should be used simultaneously. OCCs have invested considerable resources to institute their “Call Before You Dig” numbers and cannot afford to, in terms of dollars and safety, abandon these established numbers.
- From time to time, misplaced calls may be received by the OCCs. The call then needs to be forwarded by the OCC to the correct call center, or the OCC needs to tell the caller the correct number to call. NGA advocates that protocols for forwarding incorrect calls by one OCC into another OCC be chosen by the OCC. For example, an OCC can choose to either forward the incorrect call into the appropriate call center, or can tell the caller what the appropriate phone number is and have the caller dial that number.
- If federal funds are available, NGA strongly endorses use of such funds to advertise and publicize this new 3-digit dialing system.
- NGA advocates that the FCC remain involved in the activities of implementing the 3-digit dialing system until technological and implementation issues are settled. This responsibility should not be relinquished to the states. It is believed that the FCC will have a greater influence to resolve issues that arise.

FCC involvement will help to avoid safety related problems. For example, emergency locates cannot afford the lost time that could result from misplaced calls and/or transfers to the appropriate OCC. In addition, there could be problems with routing calls along the borders of OCC territories which the FCC would be more readily capable of resolving than the states would.

- NGA does not advocate “shared” use of a N11 number, as this practice may become a nuisance and result in deterring excavators from notifying OCCs of their projects. This concept involves dialing a number, for example, 811, and then navigating through a voice menu, i.e., ‘For the one-call center, please press 4’, etc.
- NGA feels that the OCCs should provide a toll free number.
- NGA agrees that the originating NPA-NXX determine the OCC into which the number will be translated.

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- The time frame for implementation should be as soon as is reasonably and technically practical. NGA does not have the expertise to offer specific comments on the technical aspects of implementation of a 3-digit code. The telecommunications industry is the appropriate party to offer meaningful comments.
- NGA suggests that reference to the 3-digit number be included on issued work permits.

Thank you for the opportunity to comment on this NOPR. Please feel free to contact me if you have questions on this submittal.

Sincerely,

Thomas M. Kiley
President
Northeast Gas Association

cc: Qualex International